BEFORE THE
CONNECTICUT DEPARTMENT OF PUBLIC UTILITY CONTROL

IN THE MATTER OF THE
SOUTHERN NEW ENGLAND
TELEPHONE COMPANY'S
PROPOSED SERVICE STANDARDS **DOCKET NO. 97-04-23**
AND FINANCIAL REMEDIES FOR
RESOLD SERVICES AND
UNBUNDLED ELEMENTS

PREFILED TESTIMONY OF STEVE ALLEN
ON BEHALF OF
THE SOUTHERN NEW ENGLAND TELEPHONE COMPANY

AUGUST 15, 1997

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1.0 QUALIFICATIONS AND EXPERIENCE

Q. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.

A. My name is Steve Allen. My business address is 3001 N. Rocky Point Drive, Suite 2000, Tampa, Florida 33607.

Q. WHAT IS YOUR PROFESSIONAL POSITION?

A. I am the Managing Partner of Allen & Company, a professional firm which provides management consulting services to utility industry clients.

1.1 Professional Background

Q. PLEASE DESCRIBE YOUR PROFESSIONAL BACKGROUND.

A. I have dedicated a substantial portion of my career to the utility industry and have experience in virtually every aspect of gas, electric and telephone utility management. This experience includes directing comprehensive management audits of major utilities on behalf of state regulatory commissions throughout the United States. I also have extensive experience in the performance of performance improvement projects for telephone, gas and electric utility clients.

Prior to establishing Allen & Company in 1993, I was a partner of Ernst & Young, the largest international accounting and consulting firm. As a partner in Ernst & Young's national Utilities Consulting Group, I directed the firm's management audit practice for ten years. Over the past fifteen years, I have had the opportunity to serve the following state regulatory commissions:

- Florida Public Service Commission
- Illinois Commerce Commission
- Louisiana Public Service Commission
- Maryland Public Service Commission
- Massachusetts Department of Public Utilities
- Missouri Public Service Commission
- New Jersey Board of Regulatory Commissioners
- New York Public Service Commission
- Pennsylvania Public Utility Commission
- Texas Public Utilities Commission.

1.2 Relevant Professional Experience

Q. PLEASE DESCRIBE YOUR EXPERIENCE WHICH IS DIRECTLY RELATED TO THE TESTIMONY YOU WILL OFFER.

A. I have performed management audits and other management consulting studies of a wide range of telephone operating companies which have provided an understanding of telephone operations, service level measurement and regulatory requirements in the unbundled, deregulated business environment. These companies include:

- Ameritech

- Anchorage Telephone Utility
- Bell Atlantic
- New York Telephone Company
- Rochester Telephone Corporation
- Sprint (United Telephone Systems Inc.)
- Southwestern Bell Telephone Company.

Specific engagements I have performed include:

- Management audit of Rochester Telephone Corporation which was performed for the New York Public Service Commission;

- Management audit of New York Telephone Company to develop a cost determination methodology for special services that would prevent subsidization of special services by POTS customers which was performed for the New York Public Service Commission;

- Comprehensive management audit of Bell Atlantic which was performed for the Maryland Public Service Commission;

- Comprehensive management audit of the Anchorage Telephone Utility which was performed for the City of Anchorage.

- Comprehensive management audit of Southwestern Bell Telephone Company which was performed for the company;

- Examination of the costs and benefits of centralized services provided by United Telephone Systems, Incorporated to its 28 operating company affiliates which was performed for the company;

- Comprehensive management audit of United Telephone System Inc.'s Midwest Division which was performed for the company.

In addition to these studies, I have performed benchmarking studies of quality of service performance standards for utility company panels. I have also performed over twenty management audits of telephone, electric or gas utilities for state regulatory commissions.

I have also spoken to industry groups. In 1991, I spoke to the NARUC Special Subcommittee on Management Analysis on the subject of auditing diversified utilities' affiliated relationships and intercompany cost allocation accounting and to the United States Telephone Association's Conference on Affiliate Relations. I also spoke at the Fall, 1992 NARUC Committee on Accounting Conference on the subject of affiliate relations accounting.

2.0 INTRODUCTION AND OVERVIEW

Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY IN THIS PROCEEDING?

A. The purpose of my testimony is to affirm the appropriateness of the measures and standards SNET has proposed for regulating the service level it provides to Competitive Local Exchange Carriers (CLECs.) SNET has proposed nineteen measures and standards. The Local Competition Users Group (LCUG) has proposed over sixty measures. The total number of measures proposed by Connecticut CLECs during negotiations with SNET is 116.

Measures and standards are needed by the DPUC for two reasons. First, they will provide a measure of the comparability of service levels provided to the CLECs by SNET. Second,

they will provide a measure of the performance quality of service levels provided to the CLECs.

From the standpoint of comparability, the purpose of the measures is to ensure nondiscriminatory service to all CLECs. Discriminatory treatment is determined by comparing the service SNET provides itself with that it provides to other CLECs. Discrete performance data must be reported for each measure for each CLEC and SNET to accomplish this purpose. The implication of a large number of standards is that regulatory oversight of nondiscrimination will be more difficult to manage.

From the standpoint of quality, the purpose of the standards is to ensure that the overall level of service provided to CLECs as a whole meets minimum regulatory requirements. This objective is similar to the objective of the oversight the DPUC currently exercises with its Quality of Service Standard (QSS) measures. Without the need to ensure nondiscriminatory comparable service, there would be no need to augment the existing QSS measures.

SNET is committed to providing nondiscriminatory service and has proposed measures responsive to the needs of the CLECs while maintaining a manageable number of measures . SNET has distilled what were 116 total measures and standards proposed by CLECs during negotiations to a manageable and representative number.

- Of the nineteen measures SNET is proposing, eight are conventional industry measures and correspond to price cap Quality of Service Standards which the DPUC has been using.

- One of the nineteen measures SNET is proposing -- Trouble Reports with Notification of Repair within 24 Hours -- has been used by other telephone companies, but not SNET.

- Ten of the nineteen measures SNET is proposing are new in response to the regulatory requirements for resale service and unbundled elements. They have not previously been used by SNET, or for that matter, other telephone companies because the market dynamic created by resale service and unbundled elements did not exist.

  - Three of the new measures are provisioning measures not previously used by SNET or other telephone companies.

  - One of the new measures is a maintenance measure not previously used by SNET or other telephone companies.

  - Three of the new measures not previously used by SNET or any other telephone companies are related to the previously unnecessary need to provide end user usage data to CLECs; Schedule 1 designates these three measures.

  - Three of the new measures not previously used by SNET or any other telephone company are related to the current need to provide the Mechanized Services Access Platform (MSAP) so that CLECS can access SNET's operational support systems.

A summary of the new versus the existing measures is provided in the table below.

Table 1
Summary of Measures

Measure	Existing	New
I. Provisioning		
1. Provisioning Center Calls Answered	X	
2. Average Service Order Installation Offered	X	
3. Installation Appointments Met	X	
4. Assigned Orders to Repair (AOR)		X
5. Completed Dispatch Service Orders Notification		X
6. Portability Within Commitment Window		X
II. Maintenance		
1. Maintenance Center Calls Answered	X	
2. Trouble Reports With Notification of Repair		X
3. Maintenance Appointments Met	X	
4. Network Repairs per 100 Lines	X	
5. Network Origin of Repeats		X
6. Mean Time to Repair	X	
7. Switch Outage Minutes per Access Line	X	
III. End User Usage		
1. End User Billing Data Distributed		X
2. End User Billing Data Distributed		X
3. Usage Polling System Availability		X
IV. Mechanized Services Access Platform		
1. Average Service Request Acknowledgment		X
2. Availability of Mechanized Interface		X
3. Firm Order Confirmation (FOR)		X

Q. WHAT IS YOUR SUMMARY ASSESSMENT?

A. Connecticut is unquestionably at the leading edge of the emerging deregulated local telephone service marketplace nationally. The DPUC set in motion changes that support both the Telecommunications Act of 1996 and Public Act 94-83. One of the outcomes of these changes is the creation of a competitive environment that requires different guidelines. The DPUC's challenge is to decide on the best measures and standards to use at the beginning stages competition without the benefit of experience.

In my professional opinion, there is no question that the nineteen measures SNET has proposed will provide the best possible resolution at this starting point. As I will explain, the critical issue confronting the DPUC is how to assure that SNET is providing comparable service to all CLECs. SNET's proposed standards are designed in a manner that will achieve this objective.

The performance standards SNET has incorporated in its measures are unquestionably rigorous compared to other telephone companies as my testimony will demonstrate. The new operating environment will be much more complex than the present with the juxtaposition of the wholesale layer into the Service Delivery Process. For example, 1) multiple CLECs will be serving the same end user; 2) the communications link between SNET and the end user will now include the additional CLEC layer; and 3) in some cases, CLECs will use SNET's outside plant, repair and installation services, and in some cases, they will provide their own. SNET's proposed standards are even more rigorous than the Quality of Service Standards. They are also more rigorous than the actual service levels

being achieved by other companies in much simpler settings. I believe that it will be a real challenge for the company to achieve them.

The nineteen measures provide a sound fundamental foundation for building a framework that will best meet the new regulatory requirements. Certainly, the measures and standards will have to be enhanced and changed over time, but, at the present time, SNET's proposed measures and standards offer the most workable solution. The measures and standards proposed by the LCUG are simply too numerous, too complex and too detailed to accomplish the task. This result is what might be expected since the LCUG proposed measures have been, in effect, designed by committee. The LCUG has simply taken every recommendation from every member and thrown them in a bag of measures and standards. Implementation of the LCUG standards would be unnecessarily costly and harmful to the process of implementing deregulation of the local telephone marketplace in Connecticut.

My summary assessment is that SNET's proposed target standards are set to provide excellent service and will effectively support the DPUC's responsibility to regulate the comparability and quality of service provided to the CLECs. The DPUC's acceptance of SNET's measures will assure the DPUC that 1) SNET is treating all CLECS on a nondiscriminatory basis, and 2) SNET's performance at the proposed services levels will provide a high level of service quality.

The LCUG's proposed target standards are excessively stringent and would not effectively support the DPUC's efforts to regulate the comparability or quality of service SNET provides. In my experience with service results, when the measurements for process or

outcome are too numerous they result in lack of focus and generally worse overall performance for all customers, retail and wholesale alike. This is an outcome the DPUC surely would want to avoid.

Q. WOULD YOU SUMMARIZE YOUR FINDINGS AND CONCLUSIONS WITH REGARD TO EACH MEASURE?

A. My findings and conclusions with regard to each measure are summarized below.

- Trouble Reports per 100 Lines

  SNET's proposed standard for Trouble Reports per 100 Lines (1.90 RPHL) is more stringent than all but one other jurisdiction. The proposed standard is also much more stringent than the actual performance achieved by any panel company. The LCUG's proposed standard is 1.5 RPHL. Since the SNET proposed standard is already more stringent than the standards of other jurisdictions and the actual performance of other companies, it is fair to say that the LCUG standard is excessively stringent and inappropriate.

- Mean Time to Repair

  SNET's proposed Mean Time to Repair standard (21 hours) is not comparable to a standard used by other jurisdictions. It can, however, be compared to the actual performance of other companies. SNET's proposed MTTR standard is comparable to the median actual performance reported by other companies. The LCUG proposed repair interval measures were defined differently from SNET's. For POTS, they proposed three measures -- 99% $\leq$ 16 hours, 95% $\leq$ 8 hours, and 90% $\leq$ 4 hours. Though somewhat different, it is evident that the LCUG standards are much more stringent than the actual performance being achieved by the panel companies.

- Maintenance Appointments Met

SNET's proposed target for Maintenance Appointments Met (94.0%) is more stringent than all but one other jurisdiction. The standard proposed by the LCUG was 99%. This standard is significantly higher than any jurisdiction and would be excessively stringent, inappropriate and unrealistic.

- Switch Outage Minutes

SNET's proposed target for Switch Outage Minutes per Access Line is 1.3 minutes as of April 1, 1997. Only two other jurisdictions use the Switch Outage Minutes per Access Line measure as a service quality measure. One of these jurisdictions (New York) uses 4.5 minutes and the other (Texas) uses 0.9 minutes. The LCUG did not propose a standard for Switch Outage Minutes.

- Installation Interval

The definition of SNET's Installation Interval standard is different from all other jurisdictions and the panel companies' reported FCC data.. SNET is proposing a measure that is on based the interval offered to the customer, whereas the panel companies' reported data is based on the average interval achieved. Consequently, a direct comparison is difficult to make. The LCUG proposed installation interval measures were defined differently from SNET's. For POTS, they proposed two measures -- < 3 days for dispatched orders and < 1 day for nondispatched orders. Though somewhat different, the LCUG standards would seem to be more stringent than the standard used by other jurisdictions or the actual performance of the companies which achieve an average installation interval of approximately 2.5 days.

- Installation Appointments Met

SNET's proposed target for Installation Appointments met (99.3%) is significantly more stringent than most other jurisdictions which typically have a standard of 95%. SNET's proposed standard is also significantly more stringent than the actual performance of the panel companies which is typically between 98.0% and 98.5%. The LCUG has not proposed an installation measure similar to the appointments met measure.

- Repair Answer Time

SNET's proposed standard for Repair Answer Time (90.4% within 20 seconds) is more stringent than any other jurisdiction. The LCUG has proposed two standards to measure repair answer time -- > 95% within 20 seconds and 100% within 30 seconds. These two standards are much more stringent than the standard used by any jurisdiction and are excessive.

- Provisioning Center Calls

SNET's proposed Provisioning Center Calls Answered measure is 80% within 20 seconds. This target is less stringent than other jurisdictions which more typically are 85% to 90% within 20 seconds. The LCUG has proposed two standards to measure installation answer time -- > 95% within 20 seconds and 100% within 30 seconds. These two standards are much more stringent than the standard used by any jurisdiction.

Q. ARE YOU PRESENTING SCHEDULES IN SUPPORT OF YOUR TESTIMONY?

A. Yes. I am submitting twelve schedules in support of my testimony. These schedules present data I used and analyses I performed in preparing my testimony.

3.0 COMPARISON OF SNET'S PROPOSED SERVICE MEASURES AND STANDARDS WITH OTHER JURISDICTIONS' STANDARDS

Q. WOULD YOU DESCRIBE HOW YOU COMPARED SNET'S PROPOSED SERVICE MEASURES AND STANDARDS WITH OTHER JURISDICTIONS?

A. I compared SNET's proposed measures and standards with a representative sample of regulatory jurisdictions. I used the eight existing measures and standards in Table 1 for my comparisons. These eight standards are also among the ten Quality of Service (QSS) standards used by the DPUC for price cap regulation of SNET.

The comparison panel included twelve state regulatory agencies and the National Association of Regulatory Utility Commissioners (NARUC) proposed service quality standards. QSS standards and measures. The panel included:

- New York
- Massachusetts
- New Jersey
- Pennsylvania
- New Hampshire
- Washington, D. C..
- Florida

- Colorado
- California
- Maryland
- Delaware
- Texas
- NARUC.

Q. WOULD YOU DESCRIBE THE RESULTS OF YOUR COMPARISON?

A. A summary of these measures and standards for SNET and the typical jurisdictional comparison is provided in the table below.

Table 2
Jurisdictional
Measures and Standards Comparative Summary

	Proposed By SNET	Typical Jurisdiction
• Trouble Reports per 100 Lines (RPHL)	1.90	4.00
• Mean Time to Repair (MTTR)	21 hours	90%/24 hours
• Maintenance Appointments Met %	94.0%	90%
• Switch Outage Minutes per Access Line	1.3	1.5
• Installation Interval	5 business days	90%/5 days
• Installation Appointments Met %	99.3%	95%
• Repair Answer Time	90.4%/20 secs.	90%/20 secs.
• Business Office Answer Time	80.0%/20 secs.	90%/20 secs.

Schedule 3 of my testimony provides a matrix which depicts the actual standards for each comparative jurisdiction.

Q. WOULD YOU DESCRIBE THE COMPARISON OF TROUBLE REPORTS PER 100 LINES?

A. SNET's proposed target for Trouble Reports per 100 Lines (RPHL) is among the most stringent at 1.9 RPHL.

- One jurisdiction is more stringent than SNET:
  - Colorado at 1.60.
- One jurisdiction is comparable to SNET:
  - Massachusetts at 1.90.
- Eight jurisdictions are less stringent than SNET:
  - Two of the eight are slightly less stringent
  - Six of the eight are significantly less stringent.

A graphical comparison of SNET's proposed RPHL standard and the other jurisdictions' standards is presented in Schedule 4 of my testimony.

The standard proposed by the LCUG was 1.5 RPHL. This standard is much more stringent than what is used in any other jurisdiction.

Q. WOULD YOU DESCRIBE THE COMPARISON OF MEAN TIME TO REPAIR?

A. A repair interval service quality measure comparable to SNET's Mean Time to Repair (MTTR) measure is not used by the other jurisdictions. Consequently, a direct comparison cannot be to made. As described in section 4.0 of my testimony, however, telephone operating companies do report actual performance to the FCC using a measure comparable to MTTR.

- SNET measures elapsed time per repair as the MTTR designation implies.
  - SNET's MTTR standard is 21 hours.
- All other jurisdictions (11) measure "percent cleared within 24 hours":
  - The percentages range from 60% to 90% among jurisdictions.
  - Eight of the eleven jurisdictions range from 80% to 90%.

A graphical comparison of SNET's proposed MTTR standard with the other jurisdictions' standards has not been made because of the difference in definition described previously. A comparison of SNET's proposed standard with the actual results of a panel of telephone operating companies is provided in section 4.0 of my testimony with an accompanying graphical comparison.

The LCUG has proposed three repair interval standards for POTS. These are 99% $\leq$ 16 hours, 95% $\leq$ 8 hours, and 90% $\leq$ 4 hours. It is evident that the LCUG standards are much more stringent than the standard used by any jurisdiction.

Q. **WOULD YOU DESCRIBE THE COMPARISON OF <u>MAINTENANCE APPOINTMENTS MET</u>?**

A. SNET's proposed target for Maintenance Appointments Met (94.0%) is more stringent than all but one other jurisdiction.

A graphical comparison of SNET's proposed Maintenance Appointments Met standard and the other jurisdictions' standards is presented in Schedule 5 of my testimony.

The standard proposed by the LCUG was 99%. This standard is substantially higher than any jurisdiction and would be excessively stringent if adopted.

Q. **WOULD YOU DESCRIBE THE COMPARISON OF SWITCH OUTAGE MINUTES PER ACCESS LINE?**

A. SNET's proposed target for Switch Outage Minutes per Access Line is 1.3 minutes as of April 1, 1997. Only two other jurisdictions use the Switch Outage Minutes per Access Line measure as a service quality measure. One of these jurisdictions (New York) uses 4.5 minutes and the other (Texas) uses 0.9 minutes. The LCUG did not propose a standard for Switch Outage Minutes.

Q. **WOULD YOU DESCRIBE THE COMPARISON OF INSTALLATION INTERVAL?**

A. The definition of SNET's Installation Interval standard is different from all other jurisdictions. Consequently, a direct comparison is difficult to make. As described in section 4.0 of my testimony, however, telephone operating companies do report actual performance to the FCC using a measure comparable to MTTR.

- SNET's proposed target for the Installation Interval standard is an overall average of 5 business days.
- SNET's proposed standard measures elapsed days to the offered appointment date per installation. It measures the basis for providing a promised installation date to the customer. SNET's promise date reliability is measured by its Installation Appointments Met proposed standard.
- All other jurisdictions measure the percentage of service orders actually completed, rather than offered, within either 3 or 5 days.
  - Three of the jurisdictions have a standard of 90% within 3 days

- Eight of the jurisdictions use 5 days with reliability ranges from 85% to 95%.

A graphical comparison of SNET's proposed Installation Interval standard with the other jurisdictions' standards has not been made because of the difference in definition described previously. A comparison of SNET's proposed standard with the actual results of a panel of telephone operating companies is provided in section 4.0 of my testimony with an accompanying graphical comparison.

The LCUG proposed installation interval measures that were defined differently from SNET. For POTS, they proposed two measures -- < 3 days for dispatched orders and < 1 day for nondispatched orders. Though somewhat different the LCUG standards would seem to be more stringent than the standard used by other jurisdictions.

Q. **WOULD YOU DESCRIBE THE COMPARISON OF <u>INSTALLATION APPOINTMENTS MET</u>?**

A. SNET's proposed target for Installation Appointments met (99.3%) is significantly more stringent than other jurisdictions.

- Of the eleven other jurisdictions using this standard:
  - One has a standard of 99%
  - One has a standard of 97.5%
  - One has a standard of 97%
  - Three have a standard of 95%
  - Four have a standard of 90%
  - One has a standard of 88%.

A graphical comparison of SNET's proposed Installation Appointments Met standard and the other jurisdictions' standards is presented in Schedule 6 of my testimony.

The LCUG has not proposed an installation measure similar to the appointments met measure.

Q. WOULD YOU DESCRIBE THE COMPARISON OF REPAIR ANSWER TIME?

A. SNET's proposed target for Repair Answer Time (90.4% within 20 seconds) is more stringent than other jurisdictions.

- Three jurisdictions use 90% within 20 seconds.
- Four use 85% within 20 seconds.
- One uses 85% within 60 seconds.
- One uses 80% within 20 seconds

A graphical comparison of SNET's proposed Repair Answer Time standard and the other jurisdictions' standards is presented in Schedule 7 of my testimony.

The LCUG has proposed two standards to measure repair answer time -- > 95% within 20 seconds and 100% within 30 seconds. These two standards are much more stringent than the standard used by any jurisdiction.

Q. WOULD YOU DESCRIBE THE COMPARISON OF PROVISIONING CENTER ANSWER TIME?

A. SNET's proposed Provisioning Center Calls Answered measure is 80% within 20 seconds. This target is less stringent than other jurisdictions in the sample.

- Three jurisdictions use 90% within 20 seconds.
- Four use 85% within 20 seconds.
- One uses 85% within 60 seconds.
- One uses 80% within 20 seconds

A graphical comparison of SNET's proposed Business Office Answer Time standard and the other jurisdictions' standards is presented in Schedule 8 of my testimony.

The LCUG has proposed two standards to measure installation answer time -- > 95% within 20 seconds and 100% within 30 seconds. These two standards are much more stringent than the standard used by any jurisdiction.

4.0 COMPARISON OF SNET'S PROPOSED QUALITY OF SERVICE STANDARDS WITH ACTUAL RESULTS OF OTHER TELEPHONE OPERATING COMPANIES

Q. WOULD YOU DESCRIBE HOW YOU COMPARED SNET'S PROPOSED SERVICE MEASURES AND STANDARDS WITH OTHER TELEPHONE OPERATING COMPANIES?

A. I compared SNET's proposed measures and standards with the actual 1996 performance of a representative sample of telephone operating companies. I used the eight existing measures and standards shown in Table 1 for my comparison. These eight standards are also among the ten standards used by the DPUC for price cap regulation of SNET.

Comparative statistics were obtained from the FCC "Quality of Service for the Local Operating Companies" database. The data were sufficient to support comparisons of four measures and standards.

The comparison panel included essentially all telephone operating companies with a scale of operations comparable to, or larger than SNET. The panel included:

- Rochester Telephone Corporation
- NYNEX - All Companies
- New York Telephone Company
- New England Telephone Company - Massachusetts
- New England Telephone Company - New Hampshire
- New England Telephone Company - Rhode Island
- New England Telephone Company - Vermont
- New England Telephone Company - Maine
- GTE - All Companies
- GTE North
- Sprint
- Bell Atlantic
- Ameritech
- U. S. West
- Bell South
- Southwestern Bell
- Pacific Telesis.

Q. DESCRIBE THE RESULTS OF YOUR COMPARISON

A. A summary of the measures and standards which were compared to actual telephone operating company performance data is provided in the table below.

Table 3
SNET Standards Compared to
Panel Companies' Actual Performance
Comparative Summary

	Proposed By SNET	Typical Telephone Company
• Installation Appointments Met	99.3%	98.1%
• Average Service Order Installation Interval	5 days	2.9 days
• Reports per 100 Lines (RPHL)	1.90	10.00
• Out of Service Repair Interval	21 hours	21 hours

Q. WOULD YOU DESCRIBE THE COMPARISON OF INSTALLATION APPOINTMENTS MET?

A. SNET's proposed standard for Installation Appointments Met (99.30%) is significantly more stringent than the actual performance of the panel companies.

- Of the 17 telephone operating companies in the comparison panel,
  - Only one panel company reported actual performance exceeding 99%.
  - Five of the seventeen panel companies reported actual performance between 98.5 and 99.0%.

- Five panel companies reported actual performance between 98.0% and 98.5%.
- Three panel companies reported actual performance between 97.5% and 98.0%.
- Two panel companies reported actual performance between 97.0% and 97.5%.
- One panel company reported actual performance of 96.1%.

A graphical comparison of SNET's Installation Appointments Met standard with the panel companies' actual performance is presented in Schedule 9 of my testimony.

The LCUG has not proposed an installation measure similar to the appointments met measure.

Q. WOULD YOU DESCRIBE THE COMPARISON OF AVERAGE SERVICE ORDER INSTALLATION INTERVAL?

A. The definition of SNET's Installation Interval standard is different from the definition used by the panel companies. SNET's standard is based on the interval offered customers whereas the panel companies' reported data is based on the average interval achieved. Consequently, a direct comparison can not be made.

- SNET's proposed target standard for the Installation Interval measure is 5 days.
- SNET's proposed standard measures elapsed days to the offered appointment date per installation. It measures the basis for providing a promised installation date to the customer. SNET's promise date reliability is measured by its Installation Appointments Met proposed standard.